

Environmental Management System Policy

Document Number: ENV-400-G-PY-002

Scope:

This policy specifies requirements for an environmental management system, to enable ASARCO to formulate goals and objectives taking into account legislative requirements and information about significant environmental impacts. It applies to those environmental aspects which the organization can control and over which it can be expected to have an influence. It does not itself state specific environmental performance criteria.

This policy is applicable to all units that have or can have a significant environmental impact and requires them to:

- implement, maintain and improve an environmental management system;
- assure itself of its conformance with the stated environmental policy;
- a) demonstrate such conformance to others;

All the requirements in the policy are intended to be incorporated into the unit's ASARCO Management System. The extent of the application will depend on such factors as the environmental policy, the nature of the unit's activities and the conditions in which it operates.

References:

- ASARCO Management System (AMS) Standard
- 0.1. Environmental, Safety and Health Policy (ENV-400-G-PY-001)

Definitions: For the purposes of this policy the following definitions apply:

Continual improvement: Process of enhancing the environmental management system to achieve improvements in the unit's overall environmental performance in line with environmental policy. The process need not take place in all areas of activity simultaneously.

Environment: Surroundings in which a unit operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental aspect: Element of a unit's activities, products or services which can interact with the environment. A significant environmental aspect is an environmental aspect which has or can have a significant environmental impact.

Environmental impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from a unit's activities, products or services.

Environmental management system: That part of the overall management system which includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy .

Environmental management system audit: Systematic and documented verification process to objectively obtain and evaluate evidence to determine whether the unit's environmental management system conforms to the environmental management system audit criteria set by the unit, and communication of the results of this process to management.

Environmental objective: Overall environmental goal, arising from the environmental policy that a unit sets itself to achieve, and which is quantified where practicable.

Environmental performance: Measurable results of the environmental management system, related to a units control of its environmental aspects, based on the environmental goals, objectives and targets.

Environmental policy: Statement by ASARCO of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.

Environmental target: Detailed performance requirement, quantified where practicable, applicable to the unit or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested party: Individual or group concerned with or affected by the environmental performance of an organization.

Prevention of pollution: Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency reduced costs.

Environmental Management System:

General: Each unit shall establish and maintain an environmental management system, the requirements of which are described in this section.

Environmental policy: The Management Committee shall define the environmental policy for ASARCO and ensure that it:

- is appropriate to the nature, scale and environmental impacts of ASARCO's activities, products or services;
- a) includes a commitment to continual improvement and prevention of pollution;
- includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which ASARCO subscribes;
- provides the framework for setting and reviewing environmental objectives and targets;
- b) is documented, implemented and maintained and communicated to all employees;
- is available to the public.

Planning

Environmental aspects: ASARCO shall establish and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment. The unit shall ensure that the aspects related to these significant impacts are considered in setting its environmental objectives.

Determination of the unit's significant environmental aspects shall be completed in the following situations:

The unit has not done this previously.

- a) Prior to the start-up of a new process or product.

Prior to modification of an existing process or product which creates new environmental aspects or significantly increases existing

environmental impacts.

The unit shall keep this information up-to-date.

Legal and other requirements: The unit shall establish and maintain a procedure to identify and have access to existing and proposed legal, and other requirements to which the unit subscribes and which are directly applicable to the environmental aspects of its activities, products or services.

Determination of the unit's applicable legal and other requirements shall be completed in the following situations:

The unit has not done this previously.

A new requirement is promulgated or an existing requirement changes.

A new process or product is planned.

a) An existing process or product is to be modified.

A comprehensive calendar of compliance obligations shall be prepared and kept current. The status and satisfaction of these obligations shall be periodically reviewed with the appropriate manager.

Objectives and targets: The unit shall establish and maintain documented environmental objectives and targets, at each relevant function and level within the unit.

When establishing and reviewing its objectives, a unit shall consider existing and proposed legal and other requirements, its significant environmental aspects, its technological options and its financial, operational and business requirements and the views of interested parties.

The objectives and targets shall be consistent with the environmental policy, including the commitment to prevention of pollution.

Environmental management plan: The unit shall establish and maintain a documented action plan for achieving its objectives and targets. This plan shall include:

designation of responsibility for achieving the objectives and targets at each relevant function and level of the organization;
the means and time frame by which they are to be achieved.

If a project relates to new developments and new or modified activities, products or services, the plan shall be amended where relevant to ensure that environmental management applies to such projects.

Community Involvement: The unit shall incorporate environmental education and awareness of the unit's activities, products and services into its community involvement plan developed pursuant to AMS - 160.

Implementation and operation

Structure and responsibility: The responsibilities, authorities and resources necessary to develop, implement and maintain the environmental management system, including the appointment of a management representative, shall be addressed by the unit in accordance with the requirements of AMS-110, AMS-120 and AMS-130.

Training, awareness and competence: The unit shall identify and document the training needs of all unit personnel. The unit shall establish and maintain procedures to ensure that all personnel whose work may create a significant impact upon the environment, receive appropriate training.

At a minimum, the training shall include:

the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;
the legal and other requirements applicable to the unit;
the significant environmental impacts, actual or potential, of the employee's work activities and the environmental benefits of improved employee performance;
the employee's role and responsibility in achieving conformance with

the environmental policy and procedures and with the requirements of the environmental management system including emergency preparedness and response requirements;
the potential consequences of departure from specified operating procedures.

Personnel performing the tasks which can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience.

Communication:

The unit shall establish and maintain procedures for:

internal communication between the various functions and levels of the unit and the corporation;

receiving, documenting and responding to relevant communications from regulatory agencies and other external interested parties;

external communication regarding the unit's significant environmental aspects and regulatory compliance status;

a) external communications with suppliers, on-site service providers and contractors.

Environmental management system documentation: The unit shall establish and maintain a framework, in paper or electronic form to :

describe the core elements of the environmental management system and their interaction;

provide direction to related documentation.

Document control: The unit shall control all documents required by this policy in accordance with the requirements of AMS-700 and AMS-710.

Operational control: The unit shall identify those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets. The unit shall plan these activities, including maintenance, in order to ensure that they are carried

out under specified conditions by:

establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets;
stipulating operating criteria in the procedures;
a) developing appropriate employee training programs;
establishing and communicating relevant procedures and requirements, including legal requirements, to suppliers, on-site service providers and contractors.

Emergency preparedness and response: The unit shall establish and maintain procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that maybe associated with them.

The unit shall review and revise, where necessary; its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.

The unit shall also periodically test such procedures when practicable.

Checking and Corrective Action:

Monitoring and measurement:

The unit shall establish and maintain documented procedures to monitor and measure on a regular basis the key characteristics of its operations and activities that can have a significant impact on the environment or are necessary to evaluate compliance with applicable legal and other requirements. This shall include the recording of information to track performance, relevant operational controls and conformance with the unit's objectives and targets.

Monitoring equipment shall be calibrated and maintained and records of

this process shall be retained according to the unit's procedures.

The unit shall develop a system for conducting and documenting routine self-inspections by unit supervision and trained staff for the purpose of evaluating conformance with the procedures and requirements of the environmental management system.

Non-conformance and corrective and preventive action:

Actual and/or potential instances of non-conformance to the environmental management system or non-compliance with legal and other requirements shall be investigated and corrected in accordance with the requirements of AMS-410 and AMS-420.

Any corrective or preventive action taken to eliminate the cause(s) of actual and potential non-conformance or non-compliance shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.

Records:

Records necessary to demonstrate conformance to the requirements of this policy shall be managed in accordance with the requirements of AMS-720.

Environmental management system audit:

Periodic audits of the environmental management system shall be conducted in accordance with the requirements of AMS-800.

Environmental compliance audits:

The unit shall establish, maintain and document a program for periodic environmental compliance audits in order to determine whether or not

the unit is in compliance with legal and other requirements.

The audit program, including a schedule, shall be based on the environmental importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedures shall cover the audit scope, frequency, auditor qualifications and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.

The results of the audit shall be reported to management and any instances of actual or potential non-compliance shall be investigated and corrected in accordance with the requirements of AMS-410 and AMS-420.

Management Review:

Management shall periodically review and continually improve the environmental management system in accordance with the requirements of AMS-140 and AMS-150.

Revision History / Reason for Change:

This is the first version of this document.

#	Revision Initiator	Approved By	Date Approved	Date Released
5.1	CMPT Team	Management Committee		